

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: James Sidney Ingram)	
)	
)	Case No. <u>16-30701-KRH</u>
)	
)	
)	Chapter <u>13</u>
Debtor(s) Address)	
8005 Creighton Pkwy Ste C #200)	
Mechanicsville, VA 23111)	
)	
Last four digits of Social Security No(s): <u>5220</u>)	
)	
)	

NOTICE OF MOTION (OR OBJECTION)

James Sidney Ingram has filed papers with the court to Vacate the Order of Dismissal and Reinstate the Case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before May 23, 2016, you or your attorney must:

- ☐ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad St.
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
8501 Mayland Dr., Ste 106
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on June 1, 2016 at 12:00 p. m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm 5000 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 5/9/2016

Signature, name, address, and telephone
number of person giving notice:

/s/ Richard J. Oulton
Richard J. Oulton
America Law Group
8501 Mayland Dr. Ste 106
Henrico, VA 23294
Virginia State Bar No. 29640
Counsel for James Sidney Ingram

Certificate of Service

I hereby certify that I have this 9th day of May, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton
Richard J. Oulton, Esq.

ACE Sales Group
657 West Indiantown Rd
Ste 205
Jupiter, FL 33458

Fredericksburg Credit Bureau
10506 Wakeman Dr.
Fredericksburg, VA 22407

Greenline Loans
PO Box 507
Hays, MT 59527

Penn Credit
PO Box 988
Harrisburg, PA 17108

Progressive Finance
PO Box 413110
Salt Lake City, UT 84141

Sharon Horner & Assoc. PLC
6804 Patterson Ave, Ste A
Richmond, VA 23226

Wells Fargo Bank NA
Recovery Dept
PO Box 5058
Portland, OR 97208

White Hills Cash
Island Finance
PO Box 330

Hays, MT 59527

Acceptance Now

attn: Customer Service
501 Headquarters Dr
Plano, TX 75024-0000

Affirm, Inc.

PO Box 2854
San Francisco, CA 94126

Ashley Furniture Homestore

6312 W Broad St.
Richmond, VA 23230

Capital One

Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0000

Celtic Bank/contfinco

121 Continental Dr Ste 1
Newark, DE 19713-0000

Central Furniture Company, Inc

3700 Mechanicsville TnPk
Richmond, VA 23223-0000

Child Support Va

Bk Unit/Div. of Child Support Enforcemen
2001 Maywill St Ste. 104
Richmond, VA 23230-0000

Contract Callers Inc.

501 Greene St. Suite 302
Augusta, GA 30901

Credit Acceptance

25505 West 12 Mile Rd
Suite 3000
Southfield, MI 48034-0000

Credit Collection Svcs

725 Canton St.
Norwood, MA 02062

Credit Control Corp

PO Box 120568
Newport News, VA 23612-0000

Dominion Dermatology PC

5201-A Hickory Park Dr.
Glen Allen, VA 23059

Dominion Virginia Power

PO Box 26543
Richmond, VA 23290

DriveTime

4112 West Broad St.
Richmond, VA 23230

Enterprise Rent A Car

323 Alexander Lee Pkwy
Williamsburg, VA 23185

ERC/Enhanced Recovery Corp

8014 Bayberry Rd
Jacksonville, FL 32256-0000

Fast Auto Loans

5218 West Broad Street
Richmond, VA 23230-0000

First Premier Bank

601 S Minneapolis Ave
Sioux Falls, SD 57104-0000

First Virginia Fin Svcs

9121 Staples Mill Rd
Henrico, VA 23228

Focus Recovery Solutions

Attn: Bankruptcy
9701 Metropolitan Court Ste B
Richmond, VA 23236-0000

Fradkin & Weber, PA

c/o Jason R. Weber, Esq
200 East Joppa Road, Suite 301
Towson, MD 21286

Fradkin and Weber

200 E Joppa Rd
Towson, MD 21286-0000

Fred Emer Med Alliance

PO Box 888
Fredericksburg, VA 22404

Golden Valley Lending Inc.

635 East Highway 20, E
Upper Lake, CA 95485

Henrico Doctors Hospital

PO Box 13620
Richmond, VA 23225

Jefferson Capital Systems, LLC

16 Mcleland Rd
Saint Cloud, MN 56303-0000

M&T Bank

PO Box 64679
Baltimore, MD 21264

Mabt/contfin

121 Continental Dr Ste 1
Newark, DE 19713-0000

Maryland State Income Tax

Comptroller of Maryland
110 Carroll St.
Annapolis, MD 21411-0000

Mid America Bank & Tru

5109 S Broadband Ln
Sioux Falls, SD 57108-0000

Mid America Bank & Trust

Total Visa
P.O. Box 91510
Sioux Falls, SD 57109-1510

MidAmerica Bank & Trust

TCI
P.O. Box 5217
Sioux Falls, SD 57117

Neurological Associates Inc

7301 Forest Ave, Suite 302
Richmond, VA 23226-0000

Nicholas Financial Inc

2454 McMullen Booth Road
Clearwater, FL 34619-0000

NPAS Solutions

PO Box 2248
Maryland Heights, MD 63043

One Hampton Medical

PO Box 3475
Toledo, OH 43607

Powell Inc

1 Fisher Street
Halifax, PA 17032-0000

Progressive Insurance

6300 Wilson Mills Rd
Mayfield Village, OH 44143

Radiologic Assoc. of Fred

PO Box 7819
Fredericksburg, VA 22404

RJM Acquisitions

575 Underhill Blvd Ste 224
Syosset, NY 11791

South Gate Financial LLC

PO Box 103
Culpeper, VA 22701

Stafford Hospital Center

2300 Fall Hill #313
Fredericksburg, VA 22401-0000

State Farm Mutual Auto Ins.

One State Farm Plaza
Bloomington, IL 61710-0000

SURGE

PO Box 8099
Newark, DE 19714

T-Mobile Bankruptcy Team

PO Box 53410
Bellevue, WA 98015-5341

United Services Automobile

USAA
9800 Fredericksburg Rd
San Antonio, TX 78288-0000

Usa Discounters Credit

PO Box 8008
Attn: Bankruptcy Department
Virginia Beach, VA 23450-0000

USA Discounters, LTD. D/B/A USA Living

PO Box 41007
Norfolk, VA 23541

USA Living

PO Box 41007
Norfolk, VA 23541

USAA c/o Sharon N. Horner & Assoc. PLC

6804 Patterson Ave., Ste. A
Richmond VA 23226

Valley Storage Robinwood

11133 Robinwood Dr.
Hagerstown, MD 21742-0000

Verizon

500 Technology Dr
Suite 500
Weldon Spring, MO 63304-0000

Verizon Wireless

PO Box 25505
Lehigh Valley, PA 18002-5505

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

James Sidney Ingram

16-30701-KRH
Chapter 13

Debtor(s)

MOTION TO VACATE ORDER OF DISMISSAL

To the Honorable Court:

The Debtor moves this Court as follows:

1. On February 19, 2016, the Debtor filed a voluntary petition in bankruptcy.
2. DCSE filed an objection to confirmation on March 25, 2016, as Debtor owed pre-petition child support arrears that the plan did not acknowledge, and he owed post-petition child support arrears.
3. An Order Denying Confirmation of Plan was filed on April 13, 2016.
4. Debtor had 21 days (until May 4, 2016) to file a modified plan or the case would be dismissed.
5. Debtor's counsel tried to address the denial of confirmation but was unable to do so in a timely fashion for the following reason:
 - a. Debtor's counsel placed a call to DCSE to request whether the arrears could be included in the modified plan and to determine the exact amount of arrears but did not receive a response before the allotted time expired.

WHEREFORE, Debtor requests that this Court vacate its order of dismissal and reinstate his Chapter 13 case to permit him to make payments to his creditors and complete his Chapter 13 bankruptcy.

Counsel for James Sidney Ingram, Debtor
Richard J. Oulton, Esquire
VSB 29640
America Law Group
t/a Debt Law Group
8501 Mayland Dr. Ste 106
Richmond, VA 23294
804-308-0051 (ph)
804-308-0053 (fax)

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1,
UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING
MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON
THE MOVING PARTY WITHIN FOURTEEN (14) DAYS OF THE SERVICE OF
THIS MOTION TO REINSTATE CHAPTER 13 CASE THE COURT MAY DEEM
ANY OPPOSITION WAIVED AND ISSUE AN ORDER SUSTAINING THE
MOTION WITHOUT FURTHER NOTICE OR HEARING.

James Sidney Ingram

Date: 5/9/2016

By /s/ Richard J. Oulton
Attorney for Debtor

Certificate of Service

I hereby certify that I have this 5/9/2016 mailed a true copy of the foregoing Notice of Motion and Hearing to Suzanne Wade, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780, The U.S. Trustee 701 E. Broad St., Ste.4304 Richmond, VA 23219, and all the creditors and necessary parties listed on the attached mailing list.

/s/ Richard J. Oulton

Richard J. Oulton

Creditors

ACE Sales Group

657 West Indiantown Rd
Ste 205
Jupiter, FL 33458

Fredericksburg Credit Bureau

10506 Wakeman Dr.
Fredericksburg, VA 22407

Greenline Loans

PO Box 507
Hays, MT 59527

Penn Credit

PO Box 988
Harrisburg, PA 17108

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PO Box 413110
Salt Lake City, UT 84141

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White Hills Cash

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Attn: Bankruptcy
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3700 Mechanicsville Tnpk
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Credit Collection Svcs

725 Canton St.
Norwood, MA 02062

Credit Control Corp

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Newport News, VA 23612-0000

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Glen Allen, VA 23059

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PO Box 26543
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DriveTime
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Richmond, VA 23230

Enterprise Rent A Car
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Williamsburg, VA 23185

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8014 Bayberry Rd
Jacksonville, FL 32256-0000

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5218 West Broad Street
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Sioux Falls, SD 57104-0000

First Virginia Fin Svcs
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Henrico, VA 23228

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Richmond, VA 23236-0000

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c/o Jason R. Weber, Esq
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Towson, MD 21286

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Henrico Doctors Hospital
PO Box 13620

Richmond, VA 23225

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Saint Cloud, MN 56303-0000

M&T Bank
PO Box 64679
Baltimore, MD 21264

Mabt/confin
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Annapolis, MD 21411-0000

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Sioux Falls, SD 57108-0000

Mid America Bank & Trust
Total Visa
P.O. Box 91510
Sioux Falls, SD 57109-1510

MidAmerica Bank & Trust
TCI
P.O. Box 5217
Sioux Falls, SD 57117

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Nicholas Financial Inc
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Clearwater, FL 34619-0000

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Maryland Heights, MD 63043

One Hampton Medical
PO Box 3475
Toledo, OH 43607

Powell Inc
1 Fisher Street
Halifax, PA 17032-0000

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Mayfield Village, OH 44143

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2300 Fall Hill #313
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One State Farm Plaza
Bloomington, IL 61710-0000

SURGE
PO Box 8099
Newark, DE 19714

T-Mobile Bankruptcy Team
PO Box 53410
Bellevue, WA 98015-5341

United Services Automobile
USAA
9800 Fredericksburg Rd
San Antonio, TX 78288-0000

Usa Discounters Credit
PO Box 8008

Attn: Bankruptcy Department
Virginia Beach, VA 23450-0000

USA Discounters, LTD. D/B/A USA Living
PO Box 41007
Norfolk, VA 23541

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PO Box 41007
Norfolk, VA 23541

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Weldon Spring, MO 63304-0000

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PO Box 25505
Lehigh Valley, PA 18002-5505